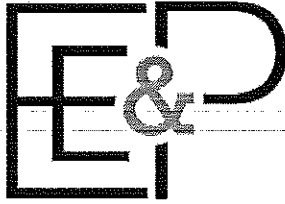


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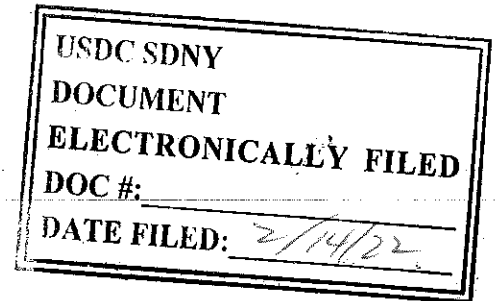
eeplaw.com
80 Pine Street, 38th Floor
New York, New York 10005
T. 212.532.1116 F. 212.532.1176

New Jersey Office
576 Main Street, Suite C
Chatham, New Jersey 07928

February 11, 2022

BY ECF

Honorable Lewis A. Kaplan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007



Re: *Hassab El Nabi v. Tocco, et al.*, 21 CV 3768 (LAK)

Your Honor:

MEMO ENDORSED

I represent plaintiff in the above-referenced action. I write jointly with defendants pursuant to Fed. R. Civ. P. 26(f)(3) to respectfully request entry of a Fed. R. Civ. P. 16(b)(1)(A) scheduling order.

If it should please the Court, the matter was removed to this Court on April 28, 2021 and designated for inclusion in the § 1983 Plan. Following preliminary investigation, the parties conferred and jointly requested removal from the § 1983 Plan by letter dated November 10, 2021 and the Court granted the parties' request by order dated November 18, 2021.

The parties have exchanged initial, limited disclosures and, as of this writing, also compiled and begun the process of reviewing the body-worn camera footage pertinent to the dispute. This is an involved process because there were several dozen officers recording video footage at the scene of plaintiff's arrest. Once the parties have digested the footage, they intend to finalize document discovery and proceed to depositions. Thus, the parties respectfully propose the following discovery schedule:

Fact discovery to be completed by:

August 11, 2022

All discovery, including expert discovery to be completed by ~~November 11, 2022~~

Joint pretrial order to be submitted and any summary judgment motions to be filed by 11/11/22
In light of the foregoing, the parties respectfully request that the Court review and endorse the proposed discovery schedule set forth above.

Thank you for your consideration of this request.

Respectfully submitted,

SO ORDERED

Gabriel P. Harvis

LEWIS A. KAPLAN, USDJ

cc: All Counsel

7/14/22